

UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF MASSACHUSETTS

GREAT NORTHERN INSURANCE COMPANY
As Subrogee of Jon and Abby Winkelreid
200 S. 6th Street
Suite 1000
Minneapolis, Minnesota 55402-1470

Plaintiff

v.

FERGUSON & SHAMAMIAN ARCHITECTS, LLP
270 Lafayette Street
Suite 300
New York, New York 10012

and

W.B. MARDEN COMPANY
2 Milk Street
Nantucket, Massachusetts 02554

Defendants

CIVIL ACTION
NO. 05-CV-10165-RGS

JOINT MOTION TO CONTINUE PRETRIAL CONFERENCE AND TRIAL DATES

Now come all parties in the above-captioned matter and respectfully request the Court continue the pretrial conference, currently scheduled for April 19, 2007, and the trial, currently scheduled for April 23, 2007, until after June 22, 2007. In support of this motion, the parties state as follows:

1. The parties are trying to resolve this case through mediation and have scheduled mediation with Honorable Judge James Ryan (ret.) of JAMS. The mediation is scheduled to go forward on May 30, 2007.

2. Although the parties are optimistic that they will be able to resolve this case at mediation, they would like to keep this case on the docket in the event that mediation is

unsuccessful. Accordingly, the parties respectfully request that this Court reschedule the pre-trial conference after June 22, 2007 and reschedule trial for the first available date thereafter. In this regard, counsel for Thirty Acre Wood, LLC is scheduled to try another federal court case between June 11, 2007 and June 22, 2007.

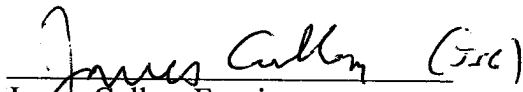
WHEREFORE, the parties respectfully request that the Court GRANT their motion and reschedule the pretrial and trial dates for dates after June 22, 2007.

Respectfully submitted,

GREAT NORTHERN INSURANCE COMPANY FERGUSON & SHAMAMIAN

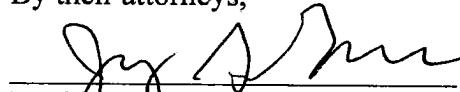
As Subrogee of Jon and Abby Winkelreid

By its attorneys,


James Cullen, Esquire
Cozen and O'Connor
1900 Market Street
Philadelphia, PA 19103

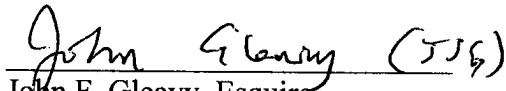
ARCHITECTS, LLP and CONSULTING
ENGINEERING SERVICES, INC.

By their attorneys,


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Jay S. Gregory, Esquire
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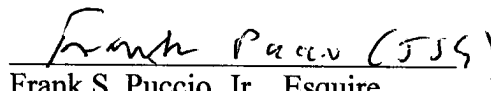
W.B. MARDEN COMPANY

By its attorneys,


John F. Gleavy, Esquire
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Lynch & Lynch
45 Bristol Drive
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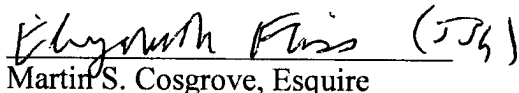
THIRTY ACRE WOOD, LLC

By its attorneys,


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Worcester, MA 01608

ELLIS AND SCHNEIDER

By its attorneys,


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P.O. Box 189
Quincy, MA 02170

Date: April 4, 2007
01074531

CERTIFICATE OF SERVICE

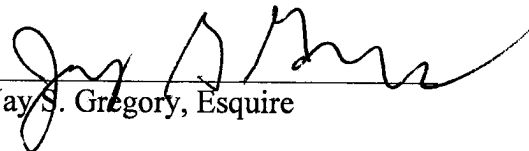
I, Jay S. Gregory, Esquire, hereby certify that on this 4 day of April, 2007, I served the attached ***Joint Motion ton Continue Pre-Trial Conference and Trial Dates*** electronically and by mailing a copy thereof, postage pre-paid to:

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